

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
) Cr. No. 09-30001-MAP
)
) Violation
vs.) 18 U.S.C. § 241
)
)
BENJAMIN HASKELL,)
MICHAEL JACQUES,)
and)
THOMAS GLEASON,)
 Defendants.)
)
)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy Against Civil Rights; 18 U.S.C. § 241)

Introduction

At all times relevant to this Indictment:

1. The Macedonia Church of God in Christ was a church located Springfield, MA.
2. The congregation of the Macedonia Church of God in Christ was composed of approximately 300 parishioners, most of whom were African-American.
3. Bishop Bryant Robinson, the CEO and Pastor of the Macedonia Church of God in Christ, was an African-American man.
4. In 2007, the Macedonia Church of God in Christ began construction of a new church building at 215 Tinkham Road in Springfield, MA. The Macedonia Church of God in Christ owned the property on which the new church building

was being constructed.

5. On November 5, 2008, construction of the new church building was approximately 75% completed.

The Conspiracy Against Civil Rights

On or about November 5, 2008, in the District of Massachusetts, the defendants,

BENJAMIN HASKELL,

MICHAEL JACQUES, and

THOMAS GLEASON,

did knowingly and willfully conspire and agree with one another and with other individuals known and unknown to the grand jury to injure, oppress, threaten, and intimidate the members, parishioners, and bishop of the Macedonia Church of God in Christ in the free exercise and enjoyment of a right secured to them by the Constitution and laws of the United States; that is, the right to hold real and personal property in the same manner as that right is enjoyed by all citizens.

It was part of the plan and purpose of this conspiracy that the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, would burn the new church building that was being constructed by the Macedonia Church of God in Christ, because of the race of the church's members, congregation, and bishop, in retaliation for the election of an African-American president on November 4, 2008.

Overt Acts

In furtherance of this conspiracy and to accomplish its objectives, the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, committed the

following overt acts, among others, all of which occurred in November, 2008, within the District of Massachusetts:

1. On or about November 4, 2008, the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, used racial slurs and expressed anger with the election of Barack Obama as the next President of the United States.
2. On or about November 4, 2008, when it became apparent Barack Obama would be elected President of the United States, the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, discussed burning the new church building that was being constructed by the Macedonia Church of God in Christ at 215 Tinkham Road in Springfield because the church members, congregation, and bishop were African-American.
3. On or about November 4, 2008, one or more of the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, obtained gasoline to start the fire at the new church building of the Macedonia Church of God in Christ.
4. On or about November 5, 2008, the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, walked through the woods to the rear of the new church building of the Maccdonia Church of God in Christ.
5. On or about November 5, 2008, one or more of the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, entered the new church building through a window and poured gasoline on the interior of the

building.

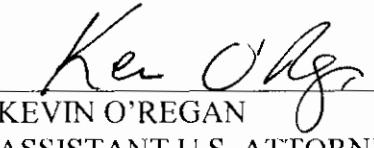
6. On or about November 5, 2008, one or more of the defendants, BENJAMIN HASKELL, MICHAEL JACQUES, and THOMAS GLEASON, poured gasoline on the exterior of the new church building of the Macedonia Church of God in Christ, ignited the gasoline, and started a fire that destroyed nearly the entire structure of the new church building and resulted in injuries to responding firefighters.

All in violation of 18 U.S.C. § 241.

A TRUE BILL

Pamela A. Barker
FOREPERSON OF THE GRAND JURY

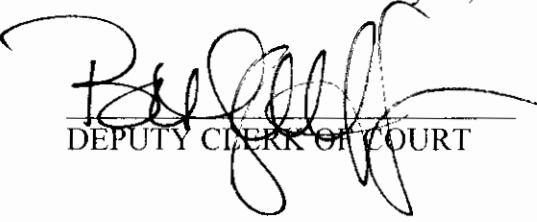

PAUL HART SMYTH
ASSISTANT U.S. ATTORNEY


KEVIN O'REGAN
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS:

Returned into the District Court by the Grand Jurors and filed on January 27, 2009.

at 3:06 pm


DEPUTY CLERK OF COURT